

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DELAWARE MARKETING PARTNERS,  
LLC, a Delaware limited liability company,

Plaintiff CA No.: 04-263

V.

CREDITRON FINANCIAL SERVICES,  
INC, a Pennsylvania corporation, and,  
TELATRON MAKETING GROUP,INC.,  
a Pennsylvania corporation,

JUDGE McLAUGHLIN AND  
MAGISTRATE JUDGE  
SUSAN PARADISE BAXTER

## TRIAL BY JURY DEMANDED

## Defendants

Electronically Filed

**CONSENTED TO MOTION TO REVISE  
CASE MANAGEMENT ORDER**

AND NOW, comes the Plaintiff, by and through its attorneys, Dickie, McCamey & Chilcote, P.C., and files the following Consented to Motion to Revise Case Management Order, respectfully representing as follows:

1. This matter involves a contract dispute that was transferred by the U.S. District Court for the District of Delaware to this Honorable Court.
  2. On August 10, 2005, this Court entered a Revised Case Management Order which directed that discovery conclude by November 11, 2005.
  3. On September 14, 2005, Plaintiff served Interrogatories and Requests for Production of Documents upon Defendants. Responses to the same are presently pending from the Defendants.
  4. Counsel have scheduled depositions of Plaintiff's and Defendants' representatives to occur November 8 - 11, 2005. The parties need additional time to facilitate the production of

discovery to Plaintiff and to allow Plaintiff's counsel a reasonable opportunity to review the same prior to the depositions.

5. Further, the parties were recently advised of scheduling conflicts on the part of witnesses necessary to be deposed in this matter that require a revision to the scheduling order. In fact, one of Defendants' representatives is unable to be deposed at the time of his scheduled deposition due to illness and pending surgery.

6. Defendant consents to this Motion to Revise Case Management Order.

7. Plaintiff respectfully requests that this Honorable Court enter an Order revising the Case Management Order so as to provide an additional forty-five (45) days for pretrial discovery and extending all other deadlines accordingly.

WHEREFORE, the parties respectfully request that this Honorable Court issue an Order revising the Case Management Order of August 10, 2005.

Respectfully submitted,

DICKIE, McCAMEY & CHILCOTE, P.C.

By s/ Steven W. Zoffer

Steven W. Zoffer, Esq. (PA ID # 62497)

Brett W. Farrar, Esq. (PA. I.D. #79217)

Two PPG Place, Suite 400  
Pittsburgh, PA 15222-5402  
(412) 281-7272  
Attorneys for Plaintiff